

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

POWER INVESTMENTS, LLC,)
)
Plaintiff/Counterclaim-)
Defendant,)
) Case No. 4:21-cv-01022
vs.)
)
CARDINALS PREFERRED, LLC,)
)
Defendant/Counterclaim-)
Plaintiff.)

DECLARATION OF WAYNE C. STANSFIELD, ESQ.

I, Wayne C. Stansfield, Esq., declare as follows:

1. I am an attorney with the law firm of Reed Smith LLP, counsel to Defendants/Counterclaim-Plaintiff Cardinals Preferred, LLC (“Cardinals”) in the above-captioned action. As such, I am fully familiar with the facts set forth herein.

2. I submit this Declaration in connection with the Defendant’s Motion for a Temporary Restraining Order and Preliminary Injunction against Plaintiff/Counterclaim Defendant’s Power Investments, LLC (“Power”).

3. Attached hereto as **Exhibit 1** is a true and correct copy of Cardinals’ Memorandum of Law in Support of its Motion for a Temporary Restraining Order and Preliminary Injunction, filed on December 20, 2021.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a Cardinals’ Memorandum of Law in Support of Defendants Motion to Disqualify and Stay Proceedings, filed on February 21, 2022.

5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the Temporary Restraining Order Hearing Transcript, dated August 19, 2021.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a letter, dated December 16, 2021, from Christopher R. LaRose, Esq.

7. Attached hereto as **Exhibit 5** is a true and correct copy of an email, dated August 31, 2021, Mr. O'Brien sent to Mr. LaRose.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a letter, dated February 17, 2022, Mr. Ruben of Sandberg Phoenix & von Gontard P.C. sent to Mr. Disque, Mr. Miller, and Mr. Dupont.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a letter, dated February 21, 2021¹, Mr. Miller sent to Mr. Disque and Mr. Dupont.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the motion and memorandum in support of a protective order (Docket 223) in *SL EL, LLC, et al. v. Ashley Energy, LLC, et al.*, Case No. 4:18-CV-01377-JAR (E.D. Mo.).

11. Attached hereto as **Exhibit 9** is a true and correct copy of Judge Ross' Order scheduling a status conference (Docket 232) in *SL EL, LLC, et al. v. Ashley Energy, LLC, et al.*, Case No. 4:18-CV-01377-JAR (E.D. Mo.).

12. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the Temporary Restraining Order Hearing Transcript, dated December 22, 2021.

13. Attached hereto as **Exhibit 11** is a true and correct copy of the Written Consent of the Board of Managers of Ashley, signed February 21, 2022.

¹ Please note, the letter is dated February 21, 2021, but was actually sent on February 21, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 25, 2022

/s/ Wayne C. Stansfield
Wayne C. Stansfield, Esq.